

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:
Gilberto Aponte	: Chapter 13
Debtor.	: Case No.: 20-10808-MDC

MOTION TO MODIFY PLAN AFTER CONFIRMATION

Gilberto Aponte (the “Debtor”), by and through their undersigned counsel, hereby moves to modify their Chapter 13 Plan and in support thereof avers as follows:

1. The Debtor filed a Chapter 13 Bankruptcy on or about February 07, 2020 (the “Petition Date”).
2. The Chapter 13 Plan was confirmed by this Honorable Court on or about June 09, 2023.
3. On March 18, 2021, Wells Fargo USA Holdings, Inc. (the “Mortgagee”) filed a Motion for Relief from Stay (the “Motion for Relief”). [Docket No 55]
4. On June 02, 2021, the Court entered an Order granting a stipulation between the Debtor and the Mortgagee which resolved the Motion for Relief. [Docket No. 72]
5. Accordingly, the Debtor is filing the instant Motion to Modify their chapter 13 plan to provide for payment of pre-petition mortgage arrears to the Mortgagee.
6. The Debtor has paid \$22,888.00 to the Chapter 13 Trustee to date.
7. The Modified Chapter 13 Plan will provide for plan payments in the amount of \$748.00 per month for 20 months for a new base amount of \$37,848.00.

WHEREFORE, Debtor, by the undersigned counsel, respectfully requests this Honorable Court to enter an Order Modifying the Chapter 13 Plan.

Dated: June 14, 2023

/s/Brad J. Sadek, Esq.

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